

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	Document WAC/032 (18.04.17)
Radiocommunication Conference Advisory)	
Committee)	

COMMENTS OF WI-FI ALLIANCE

Wi-Fi Alliance^{1/} hereby submits these comments in response to the Public Notice issued by the International Bureau in the above-referenced proceeding seeking comment on the World Radiocommunication Conference Advisory Committee's ("Advisory Committee") draft recommendations and the National Telecommunications and Information Administration's ("NTIA") draft preliminary proposals for the U.S. positions at the 2019 World Radiocommunication Conference ("WRC-19").^{2/} Wi-Fi Alliance supports the Advisory Committee's recommendation and NTIA's draft proposal for Agenda Item 1.12, both of which recommend no change to the Radio Regulations or regulatory actions to identify spectrum for Intelligent Transportation Systems ("ITS").^{3/}

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^{2/} *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 17-365 (rel. Apr. 24, 2017) ("Public Notice").

^{3/} See Public Notice, Exhibit A at 9; Public Notice, Exhibit B at 8.

I. BACKGROUND

Wi-Fi Alliance is a global, non-profit industry association of over 700 leading companies from dozens of countries devoted to connecting everyone to everything everywhere. With technology development, market building, and regulatory programs, Wi-Fi Alliance has enabled widespread adoption of Wi-Fi worldwide, certifying thousands of Wi-Fi products each year. The mission of Wi-Fi Alliance is to provide a highly effective collaboration forum for Wi-Fi matters, grow the Wi-Fi industry, lead industry growth with new technology specifications and programs, support industry-agreed standards, and deliver greater product connectivity through interoperability, testing, and certification.

Wi-Fi Alliance has been an active participant in the Commission's proceeding that modified its regulations governing the use of the 5 GHz band for Unlicensed National Information Infrastructure ("U-NII") operations.^{4/} As Wi-Fi Alliance has pointed out, the latest generation of Wi-Fi technologies is optimized for the wider bandwidths that the 5 GHz band can support.^{5/} Accordingly, and more recently, it has participated in both the Commission's further evaluation of potential sharing of the 5850-5925 MHz band (the "5.9 GHz band") with the Dedicated Short-Range Radio Communications ("DSRC") service and the Department of Transportation's ("DoT") proceeding proposing a Federal Motor Vehicle Safety Standard and performance requirements for DSRC-based vehicle-to-vehicle communications.^{6/} WRC-19 Agenda Item 1.12 would consider possible global or regional harmonized frequency bands for

^{4/} See Comments of Wi-Fi Alliance, ET Docket No. 13-49 (filed May 28, 2013); Reply Comments of Wi-Fi Alliance, ET Docket No. 13-49 (filed July 24, 2013).

^{5/} *Federal Motor Vehicle Safety Standards; V2V Communications*, Notice of Proposed Rulemaking, 82 Fed. Reg. 3854, 3881 (Jan. 12, 2017).

^{6/} See Comments of Wi-Fi Alliance, ET Docket No. 13-49 (filed July 7, 2016); Reply Comments of Wi-Fi Alliance, ET Docket No. 13-49 (filed July 22, 2016); Comments of Wi-Fi Alliance, Department of Transportation, Docket No. NHTSA-2016-0126 (filed April 12, 2017).

ITS, which overlaps with matters the Commission and DoT are considering. Accordingly, Wi-Fi Alliance supports the positions of the Advisory Committee and NTIA, which support no change to the Radio Regulations or regulatory action on that agenda item. The Commission and the DoT should be permitted to continue their work without the potential additional complications created by international regulation of these issues.

II. COMMENTS

A. The Commission and DoT Are Examining Use of the 5.9 GHz Band.

Unlicensed spectrum is critically important to the wireless ecosystem, drives the U.S. economy, and the demand for Wi-Fi, in particular, will exceed available unlicensed spectrum capacity.^{7/} By 2020, Wi-Fi networks around the world will need access to more mid-band spectrum in the 5 GHz range to satisfy the expected growth of Wi-Fi data traffic.^{8/} Additionally, unlicensed spectrum has proven invaluable to licensed carriers and technologies, which have come to rely on Wi-Fi offloading at exponential rates,^{9/} allowing licensed providers to deliver high quality service to consumers.

Because of the dramatic increase in the need for additional unlicensed spectrum, regulators must assess how licensed and unlicensed devices can share spectrum. The Commission and DoT are doing just that in examining spectrum sharing in the 5.9 GHz band.^{10/}

^{7/} See Quotient Associates, *Wi-Fi Spectrum Needs Study* (Feb. 2017), http://www.wi-fi.org/download.php?file=/sites/default/files/private/Wi-Fi%20Spectrum%20Needs%20Study_0.pdf.

^{8/} *Additional Unlicensed Spectrum Needed to Deliver Future Wi-Fi Connectivity* (Feb. 27, 2017), <https://www.wi-fi.org/news-events/newsroom/additional-unlicensed-spectrum-needed-to-deliver-future-wi-fi-connectivity>.

^{9/} Consumers demand throughput and the ability to connect to a huge array of devices resulting in unlicensed spectrum shouldering the load of carrying traffic to and from the Internet. See Comments of Wi-Fi Alliance, GN Docket No. 14-177, et al., at 5, n.11 (filed Sept. 30, 2016).

^{10/} For example, in the Commission's 5.9 GHz proceeding, Wi-Fi Alliance has consistently urged the Commission to act quickly to take steps that would allow the Wi-Fi industry and others to unlock the potential of additional capacity offered by the 5.9 GHz band.

The 5.9 GHz band can be a critical resource for meeting the growing demand for available spectrum, as it is ideally positioned for expanding use of Wi-Fi and other unlicensed technologies. Because the 5.9 GHz band is adjacent to other bands already used by unlicensed technologies, the same equipment will be able to take advantage of additional capacity and offer higher speeds using wider bandwidths — assisting in meeting the challenges of the rapidly growing demand for higher bandwidth data streams. Moreover, Wi-Fi is a technology that is specifically designed to take advantage of spectrum sharing capabilities. Therefore, the 5.9 GHz band has the potential to help share the burden of increasingly crowded unlicensed spectrum and offer additional technical benefits.

B. The Advisory Committee and NTIA Appropriately Recommend No Change in Radio Regulations or Regulatory Action.

Wi-Fi Alliance strongly supports the recommendation of the Advisory Committee and the proposal of NTIA regarding Agenda Item 1.12. As noted above, both the FCC and DoT are currently evaluating the potential shared use of the 5.9 GHz band between unlicensed devices and DSRC. The U.S. should, therefore, not support change to the Radio Regulations or regulatory action for ITS until both agencies complete their work. Because the Commission's and DoT's work is still in progress, additional time is required for the agencies' full assessment of the potential shared use of the 5.9 GHz band. To the contrary, adoption of Radio Regulations harmonizing global or regional spectrum allocation for ITS could frustrate the Commission's and DoT's efforts and unnecessarily direct the agencies' determinations about the 5.9 GHz band. A global or regional allocation for ITS could prematurely set the direction that the Commission and other communications regulatory agencies might follow rather than engaging in their own inquiries and reaching their own conclusions regarding the 5.9 GHz band.

III. CONCLUSION

Wi-Fi Alliance supports the positions that the Advisory Committee and NTIA have taken in preparation for WRC-19 with respect to Agenda Item 1.12. The U.S. position on ITS and the 5.9 GHz band should be consistent with the Commission's and DoT's ongoing proceedings. Accordingly, Wi-Fi Alliance agrees that the U.S. position should continue to urge no action at this time to establish Radio Regulations or regulatory actions in this area.

Respectfully submitted,



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May 8, 2017